

P.O. Box 11263 <sup>A</sup> Columbia, S.C. 29211

August 10, 2007

# **VIA EFILING AND HAND DELIVERY**

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

Re:

Petition of the Office of Regulatory Staff For Commission to Order a Rule To Show Cause As To Why The Certificates Of Public Convenience and Necessity for Certain Providers of Tologommunications Services Should Not Be Povelsed

Providers of Telecommunications Services Should Not Be Revoked

PSC Docket No.: 2007-253-C

Dear Mr. Terreni:

Enclosed for filing please find the original and one (1) copy of the Office of Regulatory Staff's First Continuing Data Request for dPi Teleconnect, LLC in the above referenced docket.

Note that the attached documents are exact duplicates, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

Thank you for you assistance and let me know if you have any questions.

Sincerely,

Shealy Boland Rubold
Shealy Boland Reibold

SBR/pjm Enclosure

cc: John J. Pringle, Jr., Esquire

#### **BEFORE**

### THE PUBLIC SERVICE COMMISSION OF

#### SOUTH CAROLINA

## **DOCKET NO. 2007-253-C**

IN RE: Petition of the Office of Regulatory
Staff for Commission to Order a Rule
To Show Cause as to Why the Certificates )
Of Public Convenience and Necessity for )
Certain Providers of Telecommunications )
Should Not be Revoked

Staff for Commission to Order a Rule

DATA REQUESTS

FIRST SET OF CONTINUING
DATA REQUESTS

# TO: JOHN J. PRINGLE, JR., ATTORNEY FOR DPI TELECONNECT, LLC:

Pursuant to S.C. Code Ann. Sections 58-4-10, 58-4-50, and 26 S.C. Code Regs. 103-833, the Office of Regulatory Staff hereby serves its First Set of Continuing Data Requests upon dPi Teleconnect, LLC (hereafter referred to as dPi).

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-833, that you answer the following data requests in writing and under oath within twenty (20) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" or "provide" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach

to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

# IT IS THEREFORE REQUESTED:

- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- IV. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Shealy Boland Reibold, of the South Carolina Office of Regulatory Staff.
- VI. That this entire list of questions be reproduced and included in front of each set of responses.
- VII. That each question be reproduced and placed in front of the response provided.
- VIII. That dPi provide three (3) paper copies/binders of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that dPi provide an electronic version of the responses.
- IX. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.

- X. That in addition to the signature and verification at the close of dPi's responses, the dPi witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XI. This Data Request shall be deemed to be continuing so as to require dPi to supplement or amend its responses as any additional information becomes available.
- XII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

# **REQUESTS:**

- 1-1 Please identify the underlying ILECs which provide service to dPi in South Carolina.
- 1-2 Please identify the number of customers for which dPi provides telecommunications service in South Carolina.
- 1-3 Please provide a detailed customer list identifying dPi's South Carolina customers and including such information as names, addresses, and telephone numbers for those customers.
- 1-4 Please provide a detailed description of dPi's process of notifying customers in the event that services are terminated.
- 1-5 Please provide copies of the scripts and/or letters used to notify customers in the event of termination of service and a timeline for implementation.

Shealy Boland Ferbel
Shealy Boland Reibold, Esquire

South Carolina Office of Regulatory Staff

1441 Main St., Ste. 300 Columbia, SC 29201

Phone: (803) 737-0800 Facsimile: (803) 737-0895 Email: sreibol@regstaff.sc.gov

August 10, 2007

## **BEFORE**

## THE PUBLIC SERVICE COMMISSION

#### **OF SOUTH CAROLINA**

**DOCKET NO. 2007-253 - C** 

IN RE: Pennon of the Office of Regulatory Staff	)
for Commission to Order a Rule To Show	)
Cause as to Why The Certificates of Public	)
Convenience and Necessity for Certain	) CERTIFICATE OF SERVICE
Providers of Telecommunications Services	)
Should Not be Revoked	)
Providers of Telecommunications Services	) CERTIFICATE OF SER )

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

John J. Pringle, Jr., Esquire Ellis, Lawhorne & Sims, P.A. Post Office Box 2285 Columbia, SC, 29202

Pamela Ⅎ. McMullan

August 10, 2007 Columbia, South Carolina